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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION

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IN RE:

ROBERT T. POLINSKI, ET AL.,

Debtors.

CASE No. 2010-25240
DC No.: SLH-1

Chapter 7

Date: June 1, 2010
Time 9:32 AM
Dept. B

MOTION TO COMPEL CHAPTER 7 TRUSTEE TO ABANDON BUSINESS

Debtors Robert T. Polinski and Carol Lee Roberts, by and through their attorney of record, Seth L. Hanson, hereby move the Court for an order compelling the Chapter 7 Trustee to abandon the Debtors' business, commonly known as Capital Accounting ("Business"). The motion respectfully represents the following:

1. Bankruptcy Code Section 554(a) states that, on request of a party in interest and after notice and a hearing, the court may order the trustee to abandon any property of the estate that is burdensome to the estate or that is of inconsequential value and benefit to the estate.
2. It is counter to the interests of the bankruptcy estate to be burdened with the potential liability associated with the continued operation of the Business during the bankruptcy

1 period. The Business and its operations are currently insured in the amount of
2 \$1,000,000.00.

3 3. As shown on Debtors' petition and schedules, including all amendments, the Business has
4 no market value.

5 4. The conduct of the Business by the debtor merely provides Debtors with reasonable
6 income.

7 5. The relief requested would not impede creditors' rights and would enable the Chapter 7
8 Trustee to satisfy concerns of potential liability.
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11 WHEREFORE, the Debtor respectfully requests that the Court order the Trustee to
12 abandon the Property.
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15 Dated: April 19, 2010

LAW OFFICE OF SETH L. HANSON

/s/ Seth L. Hanson

SETH L. HANSON

Attorney for Debtors
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